

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

Plaintiffs,

V.

THE GEO GROUP, INC., a Florida corporation,

Defendant.

No. 17-cv-05769-RJB

DECLARATION OF R. ANDREW FREE

DECLARATION OF R. ANDREW FREE

Pursuant to 28 U.S.C. § 1746, I, R. Andrew Free, hereby declare under penalty of perjury that the following is true and correct:

1. Plaintiffs attached four Exhibits to Plaintiffs' Opposition to Defendant's Motion to Dismiss the First Amended Complaint:
 - a. Exhibit A – GEO's Second Supplemental Response to Plaintiffs' Request for Admission Number 2 in *Menocal v. The GEO Group, Inc.*, No. 1:14-cv-02887-JLK (D. Colo.), provided July 21, 2017.
 - b. Exhibit B – Excerpts from agency records provided by U.S. Immigration and Customs Enforcement in response to a Freedom of Information Act assigned tracking number ICE 2013FOIA32547, which were disclosed

during litigation in *Stevens v. U.S. Dep’t of Homeland Security*, No. 1:14-cv-3305 (N.D. Ill. Filed May 6, 2014).

- c. Exhibit C – An excerpt of the Detainee Handbook GEO provided detained immigrants at is LaSalle Detention Facility in Jena, Louisiana in 2014 or 2015.
- d. Exhibit D – Hearing Transcript from April 24, 2018 motion hearing before this Court.

2. Each of these Exhibits is a true and accurate copy of the original record provided, except with respect to the highlights to portions of Exhibit A, which were applied by counsel.

3. Plaintiffs submit Exhibits A-C in support of their contention that the additional facts averred by GEO’s counsel—many of which are unsworn and unsupported by documentary evidence—are disputed and will be challenged in the course of discovery.

DATED this 18th day of July, 2018.

LAW OFFICE OF R. ANDREW FREE

/s/ R. Andrew Free
Counsel for Plaintiffs

DECL. OF R. ANDREW FREE
(17-cv-05769-RJB) - 2

Law Office of R. Andrew Free
P.O. Box 90568
Nashville, TN 37209
(844) 321-3221x1 (615) 829-8969

CERTIFICATE OF SERVICE

I certify that I caused to be served in the manner noted below a copy of the foregoing pleading on the following individual(s):

Adam J Berger
SCHROETER GOLDMARK & BENDER
810 3RD AVE
STE 500
SEATTLE, WA 98104

Andrea D'Ambra
NORTON ROSE FULBRIGHT US LLP (NY)
1301 AVENUE OF THE AMERICAS
NEW YORK, NY 10019

Charles A Deacon
NORTON ROSE FULBRIGHT US LLP (SAN ANTONIO)
300 CONVENT ST
STE 2100
SAN ANTONIO, TX 78205

Mark Emery
NORTON ROSE FULBRIGHT US LLP (DC)
799 9TH STREET
STE 1000
WASHINGTON, DC 20001

R Andrew Free
LAW OFFICE OF R. ANDREW FREE
PO BOX 90568
NASHVILLE, TN 37209

Lindsay Halm
SCHROETER GOLDMARK & BENDER
810 3RD AVE
STE 500
SEATTLE, WA 98104

Joan K Mell
III BRANCHES LAW PLLC
1019 REGENTS BLVD STE 204
FIRCREST WA 98466

1 Meena Pallipamu Menter
2 MENTER IMMIGRATION LAW PLLC
3 8201 164TH AVENUE NE, STE 200
4 SEATTLE, WA 98052

5 Devin T Theriot-Orr
6 SUNBIRD LAW PLLC
7 1001 4TH AVENUE
8 STE 3200
9 SEATTLE, WA 98154

10
11 Jamal N Whitehead
12 SCHROETER GOLDMARK & BENDER
13 810 3RD AVE
14 STE 500
15 SEATTLE, WA 98104

16
17 DATED: July 16, 2018 at Nashville, Tennessee

18
19 /s/ R. Andrew Free

20
21 R. Andrew Free

22
23
24
25
26

DECL. OF R. ANDREW FREE
(17-cv-05769-RJB) - 4

Law Office of R. Andrew Free
P.O. Box 90568
Nashville, TN 37209
(844) 321-3221x1 (615) 829-8969